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Marci Henson, Director

September 2, 2021

Elizabeth Adams, Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: Submittal of Clark County, Nevada, Exceptional Event Demonstrations for the 2015 Ozone NAAQS Las Vegas Valley Nonattainment Area

Dear Ms. Adams:

The Clark County Department of Environment and Sustainability (DES) is pleased to submit demonstrations for the following exceptional events. DES requests EPA initiate parallel processing of these demonstrations.

Event Date(s)	Event Type
June 23, 2018	Wildfire
June 27, 2018	Wildfire
July 14–17, 2018	Wildfire
July 25–27, 2018	Wildfire
July 30–31, 2018	Wildfire
August 6–7, 2018	Wildfire
August 3, 2020	Wildfire
August 7, 2020	Wildfire
August 18–21, 2020	Wildfire
September 26, 2020	Wildfire

Between 2018 and 2020, Clark County recorded several exceedances of the 2015 ozone National Ambient Air Quality Standard (NAAQS) that were caused by wildfire smoke or stratospheric intrusions. This submittal contains demonstrations for 20 of the 28 exceedance events in 2018 and 2020 that were identified in our November 30, 2020 Initial Notification of Intent summary and for which DES requests data exclusion. Demonstrations for the other 8 exceedance events were included in our July 1 submittal as agreed to in EPA's communication dated May 4, 2021.

Under the Exceptional Events Rule (EER), codified at 40 CFR Parts 50.1, 50.14, and 51.930, air agencies may petition EPA to exclude air quality monitoring data influenced by exceptional events from applicable regulatory determinations. The attached demonstrations will show these exceedances would not have occurred without wildfire impacts.

Having fulfilled the requirements of the EER, DES requests EPA concur with the enclosed demonstrations and exclude the associated data from use in regulatory determinations for the 2015 ozone NAAQS in accordance with 40 CFR Part 50.14(b)(1). The Nevada Department of Environmental Protection will soon submit, under separate cover, a request for an EPA determination of attainment of the 2015 ozone NAAQS for the Las Vegas Valley nonattainment area based on exclusion of the 2018 and 2020 exceptional event data included in this and the previous July 1, 2021 submittal. That document will include a request for a one-year extension of the NAAQS attainment date if EPA does not concur with all proposed 2018 exceptional events and based on EPA's concurrence with all proposed 2020 exceptional events.

These demonstrations will be available for public comment for a 30-day period, beginning September 3, 2021, and concurrent with EPA's review, in accordance with the requirements of 40 CFR Part 50.14(c)(3)(v). Documentation of the public comment process, along with all comments received and DES responses, will be submitted to EPA after completion of the comment period.

If you have any questions regarding this submittal, please contact Araceli Pruett at (702) 455-3206 or araceli.pruett@clarkcountynv.gov.

Sincerely,



Marci Henson, Director

Attachment(s):

1. Demonstrations (10)

cc:

Anna Mebust, EPA Region 9
Gwen Yoshimura, EPA Region 9
Randall Chang, EPA Region 9
Karina O'Connor, EPA Region 9
Sig Jaunaraajs, NDEP
Danilo Dragoni, NDEP
Francisco Vega, Washoe County AQMD
Daniel Inouye, Washoe County AQMD
Araceli Pruett, Clark County DES